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IN THE U.S. DISTRICT COURT OF ALASKA

AT ANCHORAGE

RONALD E. ZUBER,)
vs.)
Plaintiff,)
APC NATCHIQ, INC.)
Defendants.)
_____) Case No. A03-0052CV (RRB)

PLAINTIFF RONALD E. ZUBER'S AFFIDAVIT IN SUPPORT OF CROSS
MOTION FOR SUMMARY JUDGMENT ON THE ISSUES OF
WILLFULNESS AND GOOD FAITH

Plaintiff Ronald E. Zuber, being first duly sworn, deposes and states as follows:

1. I am the Plaintiff in the above-captioned matter and make this affidavit in support of Plaintiff's Motion for Summary Judgment on Good Faith and Opposition to Motion for Tolling of Statute of Limitations.
2. Calculations in this matter arguably show damages in excess of \$100,000 for a period of one and one half years.

3. To the best of my knowledge Defendant APC often times employed in the range of 10 safety specialist at any one point, and if all of them were to file claims it could have a value in excess of one million dollars.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

Dated: _____

Ronald E. Zuber

SUBSCRIBED AND SWORN to before me this _____ day of September, 2003.

NOTARY PUBLIC IN AND FOR THE
STATE OF WASHINGTON
MY COMMISSION EXPIRES: _____

Orig file +
Stanford
9/26/03